

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

ANN LEDFORD, individually and as next
friend and mother of Johnathan Binkley, deceased.

Plaintiff,

v.

KNOX COUNTY, TENNESSEE: KNOX COUNTY
SHERIFF'S OFFICE; KNOX COUNTY SHERIFF
TOM SPANGLER, individually and in his official
capacity; JAMES BRADSHAW, COREY CAMPBELL,
PAUL BURNETT, CLAY HARRELL, ZACH DOSS,
CHADWICH SHANE MAY, GAVIN BALES,
CHRISTIAN GOMEZ, NATHAN STACHEY,
DENNIS SOSVILLE, DUSTIN FARMER, DENIFE
JONES, BRADLEY FINLEY, JOSHUA BOWERS,
AND JOHN DOES I-X, individually and in their
official capacities,

Defendants.

Case No. 3:20-CV-325

Corker / Guyton

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO FILE RESPONSIVE PLEADINGS OR MOTIONS**

Come now the parties, by and through their respective counsel, and jointly move this Honorable Court for an extension of time, to and including December 18, 2020, for all defendants to file responsive pleadings or motions.

In support hereof, the parties would show that Defendants' counsel has raised several issues as potential grounds for dismissal of Plaintiff's claims asserted in her First Amended Complaint [Doc. 6] and, as a result, the parties' counsel are engaging in discussions as required by the Court's Order Governing Motions to Dismiss [Doc. 3]. As a result of those discussions, Plaintiff has

agreed to forward to Defendants' counsel a proposed Second Amended Complaint by October 23, 2020, and to forward to Defendants' counsel proposed exhibits to said amended complaint, including excerpts from body cam videos, within a reasonable time thereafter (which is expected to be approximately three weeks). So that the parties may continue to have good faith discussions in accordance with the Court's referenced Order Governing Motions to Dismiss, which may include Plaintiff filing a Second Amended Complaint, either by agreement (with Defendants reserving all rights and defenses) or by Plaintiff seeking leave of the Court, the parties respectfully request that Defendants be allowed additional time, through and until December 18, 2020, to file responsive pleadings or motions to dismiss in this case.

Respectfully submitted this the 19th day of October, 2020.

/s/ David S. Wigler
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s/Wayne A. Ritchie II
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